

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DILIP JANA,

Plaintiff,

v.

WALMART INC.,

Defendant.

§
§
§
§
§
§
§
§
§

Civil Action No. 4:24-cv-00698-SDJ-BD

DECLARATION IN SUPPORT OF DEFENDANT’S REPLY

My name is Morgan Jones. I am over 21 years of age, of sound mind, and am capable of making this declaration. I have never been convicted of a felony or crime of moral turpitude. I have personal knowledge of the facts stated in this declaration and hereby declare that all such facts are true and correct. I could testify competently to these facts if called as a witness.

1. I am an associate at the law firm, Greenberg Traurig, LLP. I am one of the attorneys serving as outside counsel for Walmart Inc. (“Walmart”) in the above-captioned action and am authorized to make this declaration on behalf of Walmart in such capacity. I submit this declaration in connection with Walmart’s Reply in support of its Second Motion for Entry of Protective Order (the “Motion”) and in response to Plaintiff’s Response in Opposition to the Motion (“Response”). This declaration and the supporting evidence referenced herein responds to and rebuts arguments and issues raised in Plaintiff’s Response. Based on my position as outside counsel to Walmart, my experience in this lawsuit, my correspondence with Plaintiff, and my review of pertinent documents, I am competent to testify to the matters contained in this declaration.

2. On April 7, 2025, Walmart’s counsel timely served Walmart’s initial disclosures on Plaintiff and filed its notice of serving initial disclosures with the Court (Dkt. 52). Later the same

day, Plaintiff responded to the email from Walmart's counsel with his own initial disclosures. A true and correct copy of the parties' email chain serving their respective initial disclosures is attached hereto as **Exhibit A-1** (without the initial disclosures themselves).

3. On June 9, 2025, I emailed Plaintiff a link to Walmart's first production of documents. This email notes that "We/Walmart are continuing to evaluate whether there are any other non-confidential documents that can be produced before a protective order is entered." On June 10, 2025, Plaintiff responded to my email with a letter objecting to Walmart's production and declining to download the documents. A true and correct copy of the parties' email exchange and Plaintiff's letter are collectively attached hereto as **Exhibit A-2**.

4. After reviewing the Response, I emailed Plaintiff on June 19, 2025 regarding certain statements in the Response related to the status of discovery and reminded him that Walmart had served initial disclosures and produced documents. A true and correct copy of my email is attached hereto as **Exhibit A-3**. To date, Plaintiff has not responded to this email or clarified the misstatements in his Response.

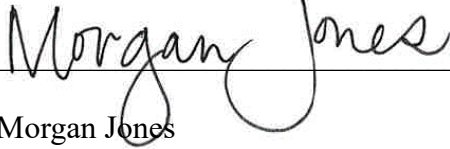
5. On June 24, 2025, I emailed Plaintiff regarding certain seemingly nonexistent cases cited in his Response and requested correct citations. On June 25, 2025, Plaintiff responded and, among other things, agreed that "accuracy in the record is essential" and stated that the "citations in question were based on legal research tools available to [him] at the time." A true and correct copy of the parties' email exchange is attached hereto as **Exhibit A-4**.

6. I recently discovered that Plaintiff seems to have started posting about this lawsuit on GoFundMe, Reddit, and potentially other sites online. True and correct printouts (as of June 25, 2025) of the GoFundMe webpage entitled "Help a Walmart Corporate Whistleblower Fight For Justice" (<https://www.gofundme.com/f/help-a-walmart-corporate-whistleblower-fight-for-justice>) and the Reddit webpage linking to the GoFundMe and discussing this lawsuit

(https://www.reddit.com/r/Crowdfunding/comments/1ke2vgm/walmart_whistleblower/) are attached hereto collectively as **Exhibit A-5**.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 25, 2025 in Dallas, Texas.


Morgan Jones